

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

YARITZA M. MIRANDA, JEZZIEL
RIVERA MIRANDA

Plaintiffs,

v.
IPR PHARMACEUTICALS, INC.;
ASTRA ZENECA PLC; MARCELINO
MELENDEZ; ROSA CARABALLO;
INSURANCE COMPANY ABS; JOHN
DOE and COMPANY XYZ

Defendants.

CIVIL NO. 10-02238 (JAF)

RE: SEX DISCRIMINATION; HOSTILE
WORK ENVIRONMENT; DAMAGES

JOINT DISCOVERY CONFERENCE REPORT

TO THE HONORABLE COURT:

COME NOW the Plaintiff Yaritza Miranda ("Miranda"), and the Defendant IPR Pharmaceuticals, Inc. (hereinafter "IPR" or "the Company"), by and through the undersigned attorneys, and very respectfully state and pray as follows:

1. On **April 20, 2011**, counsel for the parties held a Discovery Conference pursuant to Fed. R.Civ.P. 26(f). In attendance were Maximiliano Plá and Myra M. Vélez Plumey, for plaintiff, and Luis F. Llach Zúñiga, for IPR.

2. As a result, the parties have agreed on a discovery plan which is hereby submitted to the Court.

3. The agreements reached by the parties are the following:

a. The parties shall exchange initial mandatory disclosures under Fed.R.Civ.P. 26(a)(1) no later than

May 4, 2011.

- b. The parties shall notify their respective First Set of Interrogatories and First Request for Production of Documents on or before **May 10, 2011**. The Interrogatories will be limited to 25 questions, including its sub-parts. The parties will have 30 days to notify the opposing party their written responses to these discovery requests.
- c. Defendant requested that Plaintiff authorize it to obtain copies of all medical and administrative records directly or indirectly related to the claims set forth in the Complaint. As agreed, on or before **May 4, 2011**, Plaintiff will provide Defendant a list with the names, addresses and phone numbers of the physicians and hospitals she has visited since the year 2005, in order for the Defendant to prepare the individual medical releases to be signed by the Plaintiff, as required by the Privacy Rules promulgated under the Health Insurance Portability and Accountability Act (HIPAA). Plaintiff will return the signed authorizations to use and disclose protected health information to Defendant on or before **May 13, 2011**.
- d. Defendant will take the deposition of Plaintiff Yaritza Miranda on **June 29, 2011**. Rodríguez' deposition will be taken at the offices of McConnell Valdés LLC, commencing at 9:30 a.m. Defendant will have up to two full business days, from 9:30 a.m. to 5:30 p.m. to take Plaintiff's deposition, until completed. If necessary, Plaintiff's deposition will be continued on **June 30, 2011**.
- e. Plaintiff's deposition will be taken in Spanish.

- f. The parties have set aside the following dates for the depositions of the witnesses announced by the parties: **July 14, 15 and 18, 2011**. The depositions will be taken at the offices of McConnell Valdés, commencing at 9:30 a.m. on each date. The parties reserve the right to depose all witnesses announced by opposing party.
- g. Any additional written discovery that the parties may wish to conduct will be notified on or before **July 22, 2011**, unless any party shows just cause, and/or additional information is required after the taking of depositions.
- h. Defendant will depose Plaintiff's expert witness(es), if any. Plaintiff will announce its expert witness(es) and make the disclosures required by Fed.R.Civ.P. 26(a)(2)(A), including the witness(es) *curriculum vitae*, no later than **June 3, 2011**.
- i. Defendant will announce its expert witness(es) and make the disclosures required by Fed.R.Civ.P. 26(a)(2)(A), including the witness(es) *curriculum vitae*, no later than **July 8, 2011**.
- j. Defendant will depose Plaintiff's expert witness during the month of **July, 2011**.
- k. Any party may not use an expert witness at trial or at the dispositive motion stage unless it has strictly complied with all of the foregoing deadlines regarding expert witnesses.
- l. As per the Court's Scheduling Order, discovery by all parties shall be completed on or before **August 8, 2011**.

m. The parties recognize their duty to supplement or correct the disclosures or responses to discovery to include information thereafter acquired or if the party learns that the response is in some material respect incomplete or incorrect.

WHEREFORE, the appearing parties respectfully request that this Honorable Court approve the discovery schedule herein proposed by the parties.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 29th day of April, 2011.

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